

# DEVIATION REQUEST FORM

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PUBLICATION DATE **14.1.2021**

Version **4.0**

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## A. To be completed by Gold Standard

### 1| Decision

**1.1 | Date** – 01/03/2022

#### **1.2 | Decision**

The applied deviation request is **not approved**. The PD shall:

1. Ensure that the duration of the GS monitoring period is not more than three years from the date of remote site visit by a VVB. For example, if the site visit is concluded on 30/06/2022, the MP cannot start before 30/06/2019 (inclusive).
2. Ensure that a continuity in the Project's monitoring activities is maintained and PD is able to justify that no monitoring gaps exist (especially for SDG parameters) within the Monitoring Period(s). However, if gap(s) exist, the project shall justify that conservative approach(es) have been applied in line with section 3 of the [Deviation Approval Requirements and Procedures \(version 1.1\)](#) and overarching GS principles (as applicable).
3. Document the deviation request, its implications, and GS' decision in the appropriate section of the GS Monitoring Report (for the relevant MP).

The verifying VVB shall, through appropriate means at its disposal, evaluate the Project's compliance with the above-mentioned conditions and provide its opinion in the Verification Report. SustainCert shall review both the PD's response and the VVB's assessment/opinion of the same and take appropriate steps.

**1.3 | Is this decision applicable to other project activities under similar circumstances?**

No

**B. To be completed by the Project Developer/Coordinating and Managing Entity and/or VVB requesting deviation** (Submit deviation request form in Microsoft Word format)

**2| Background information**

Deviation Reference Number	DEV_239	
Date of decision	01/03/2022	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	24/02/2022	
Project/PoA/VPA	Project	ID – GS1061
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	Kayseri Molu Landfill Gas to Electricity Project, Turkey	
Location of project/PoA/VPA	Turkey	
Scale of the project/PoA/VPA	<input type="checkbox"/> Microscale <input type="checkbox"/> Small scale <input checked="" type="checkbox"/> Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA	<a href="https://registry.goldstandard.org/projects/details/1636">https://registry.goldstandard.org/projects/details/1636</a>	
Status of the project/PoA/VPA	<input type="checkbox"/> New <input type="checkbox"/> Listed <input type="checkbox"/> Certified design <input checked="" type="checkbox"/> Certified Project	
Title/subject of deviation	Monitoring Period Extension	
Specify applicable rule/requirements/methodology and version number	ACM0001 Version 13"	
Specify the monitoring period for which the request is valid (if applicable)	Start date 31/03/2019      End date 01/04/2022	
Submitted by	Contact person name: Hakkı Azizlerlioğlu	
	Email ID: hakkia@herenerji.com.tr	
	Organisation: Her Enerji Uretim Sanayi ve Ticaret A.Ş.	
	Project participant: Yes <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
Validation and Verification body (VVB opinion shall be included, where required by the applicable)	Yes <input type="checkbox"/> NO <input checked="" type="checkbox"/>  If yes; VVB name:	

rules/requirements or request is submitted by the VVB).	Auditor name:
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### 3| Deviation detail

#### 3.1 | Description of the deviation:

*\*Guidance\* Use the space below to describe the deviation and substantiate the reason for requesting deviation from applicable rules/requirements. Please include all relevant information in support of the request. You are requested to follow the principles for requesting deviations, given in the [Deviation Approval Procedure/ Design Change Requirements](#).*

##### 3.1.1 | Deviation detail (to be completed by Project developer):

Our Project, GS 1061 Kayseri Molu Landfill Gas to Electricity Project, started generating electricity on 24/10/2011; thus, its Crediting Period was set as 01/12/2011-30/11/2021 in the registered PDD. The Project conducted its first verification between 01/12/2011 – 31/03/2014 and its second verification between 01/04/2014 – 31/12/2016. The Project Owner now wants to conduct the third verification. However, the Second Verification could be completed very recently because there are only two active VVBs in Turkey (ReCarbon and RINA) with local offices, and both of them have few local experts to handle voluntary projects. Also, due to pandemic conditions, they couldn't increase their capacity, and they are now overwhelmed by too many projects to which they need to provide service. Due to these reasons, the VVBs were late submitting their proposals, and the Project Owner was delayed in initiating the third verification process. Additionally, a 10-year fixed crediting period has been determined for this project activity, which impedes the Project for further certification rights. Also, this project activity will benefit from the Turkish Renewable Energy Resources Support Mechanism (YEKDEM) until 2022, and the electricity produced after this date will have to be sold to the market at uncertain and low prices. Carbon certification income is much more critical and very much needed now. For this reason, we kindly request with this deviation request form an extension of the third monitoring period with a physical site visit from 3 to 4 years. In this way, the Monitoring Period will be determined for 31/03/2018 - 01/04/2022, considering the site visit would be conducted in April 2022 at the earliest and the 10-year fixed crediting period ends 30/11/2021. The Project will only certify the period between **31/03/2018-30/11/2021**.

##### 3.1.2 | VVB opinion (to be completed by VVB, if applicable):

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### 3.2 | Assessment of the deviation:

*\*Guidance\* Use the space below to describe how the deviation complies with the requirements, and, where applicable, the accuracy, completeness and conservativeness is ensured. Please include all relevant information in support of the request.*

#### 3.2.1 | Deviation assessment (to be completed by Project developer):

According to the rules of GS, the maximum allowed period for monitoring is three years with a physical site visit. If the Third Monitoring Period extension with a physical site visit from 3 to 4 years would be allowed, it will reduce the loss of rights caused by the COVID 19 pandemic for one year for the Project Owner. Moreover, since a 10-year fixed crediting period has been determined for this Project, carbon certification income is much more critical.

#### 3.2.2 | VVB opinion (to be completed by VVB, if applicable):

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### 3.3 | Impact of the deviation:

*\*Guidance\* Use the space below to describe the impact of the deviation on project design, safeguarding principles assessment, SDG assessment, emissions reductions, monitoring frequency, data quality, potential risk or any other relevant aspect of the Project. Please substantiate the impact assessment with relevant and verifiable data/information.*

#### 3.3.1 | Impact assessment (to be completed by Project developer):

If the Monitoring Period is 31/03/2019 – 01/04/2022, the Project will be able to certify the period of 31/03/2019 - 30/11/2021, and the Project will lose one year of emissions reduction certification right. However, the loss will be reduced if we extend the Monitoring Period to four years (i.e., 31/03/2018 – 30/11/2021) with a physical site visit. Again, since a 10-year fixed crediting period has been determined for this Project, carbon certification income is much more critical. On the other hand, Project will monitor the relevant monitoring parameters for 31/03/2018 – 30/11/2021.

#### 3.3.2 | VVB opinion (to be completed by VVB, if applicable ):

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### 3.4 | Documents:

*\*Guidance\* List of documents provided (note that once a decision has been made by Gold Standard, this deviation form along with supporting documents will be made public on the Gold Standard website. If any of the supporting documents are confidential, please indicate here to ensure they are omitted.)*